

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

William Reynolds, individually; as
spouse of Sylwia Pawlak Reynolds; and
as next friend of their minor children,
AMR, WR, and AR,

Court File No. 25-cv-754-LMP-JFD

Plaintiff,

v.

Nancy Sanders Harper, M.D. et al.,

**STIPULATION TO EXTEND
TIME TO RESPOND TO
PLAINTIFF'S AMENDED
COMPLAINT**

Defendants.

Plaintiff William Reynolds and Defendant University of Minnesota Foundation (“UMF”), by and through their respective counsel, hereby stipulate and agree to the following:

1. WHEREAS, Plaintiff filed this action on February 27, 2025;
2. WHEREAS, Plaintiff filed an Amended Complaint on March 31, 2025;
3. WHEREAS, the Court may extend the time to answer or otherwise respond to the Complaint for good cause, *see* Fed. R. Civ. P. 6(b);
4. WHEREAS, counsel for Plaintiff and UMF met and conferred on issues related to waiver of service of the Amended Complaint and the time for UMF herein to respond to Plaintiff's Amended Complaint, and the parties have agreed to cooperate on these issues;
5. WHEREAS, Defendant University of Minnesota Foundation executed a waiver of service on June 6, 2025 (ECF No. 27);

6. WHEREAS, on June 5, 2025, the Court entered an order extending the deadline to August 1, 2025 for other Defendants to respond to the Amended Complaint (ECF. No. 26.);

7. WHEREAS, counsel for Plaintiff and UMF agree that the deadline to answer or otherwise respond to Plaintiff's Amended Complaint may be extended until August 1, 2025.

NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the parties to this Stipulation that the Court may enter an Order that states that UMF shall answer or otherwise respond to Plaintiff's Amended Complaint on or before August 1, 2025.

STIPULATED TO BY:

Dated: June 20, 2025

Law Offices of J.M. Reinan, PC

/s/ Jerome M. Reinan

JEROME M. REINAN (#24322X)
 JORDANA GRIFF GINGRASS (#0504949)
 1437 High Street
 Denver, CO 80218
 Telephone: (303) 894-0383
jreinan@reinanlaw.com
jgingrass@reinanlaw.com

Attorney for Plaintiff

Dated: June 20, 2025

LATHROP GPM LLP

/s/ David C. Archer

David C. Archer (MN #0399150)
3100 IDS Center, 80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 632-3000
Fax: (612) 632-4000
david.archer@lathropgpm.com

*Attorney for the University of
Minnesota Foundation*